1	LAW OFFICE OF RESHMA KAM	IATH							
2	Reshma Kamath, Cal. Bar No. 333800								
	700 El Camino Real, Suite 120, #1084,								
3	Menlo Park, California 94025, United States								
4	Phone-number: 650 257 0719								
5	E-mail address: reshmakamath2021@	gmail.com							
6	COUNSEL FOR DEFENDANTS								
	RUIFENG BIZTECH INC.; GANG	•							
7	ALAN LI; AND, RF BIOTECH LL	.C.							
8									
9		TES DISTRICT COURT							
10		STRICT OF CALIFORNIA NCISCO DIVISION							
	SANFRA	incisco division							
11	QUINTARA BIOSCIENCES, INC.,	G N 2.20 04000 WW							
12	a California corporation,	Case No. 3:20-cv-04808-WHA							
13	DI 1 1 CC	[Assigned to presiding Judge Honorable							
14	Plaintiffs,	William Alsup]							
15	v.								
16	DIJLEENG DIZTEGILING								
	RUIFENG BIZTECH INC., a California corporation, GANGYOU	ADDENDUM TO JOINT DISCLOSURE							
17	WANG, an individual, ALEX	OF TRIAL EXHIBIT LIST PURSUANT TO FED. R. CIV. P. 26(A)(3)(A)							
18	WONG, an individual, ALAN LI,	10 FED. R. CIV. 1 . 20(A)(3)(A)							
19	an individual, RUI SHAO, an								
20	individual, and RF BIOTECH LLC,								
	a California limited liability company,								
21	company,								
22	Defendants.								
23									
24									
25									
26									
27	TO THE HONODADIE COL	RT, ALL PARTIES, AND ATTORNEYS OF							
28	RECORD HEREIN	KI, ALL I AKIILS, AND AI IUKNEIS UF							

1 Case No. 3:20-cv-04808-WHA
JOINT DISCLOSURE OF TRIAL EXHIBITS PURSUANT TO FED. R. CIV. P. 26(A)(3)(A)

Pursuant to the Final Pre-trial conference held on June 28, 2023, and Honorable Judge William H. Alsup's direct Orders, the Defendants Ruifeng Biztech Inc., Gangyou Wang, Alan Li, and, RF Biotech LLC ("Defendant") submit the addendum to the joint exhibit list for trial in this matter Disclosure of Trial Exhibits Pursuant to Fed. *R. Civ. P.* 26(a)(3)(A). The parties reserve the right to amend and/or supplement the below trial exhibit list:

Exh .	Bate-Stamped	Time- Period	Description	Offe red By (P/D)	Sti p. to Au the n.?	Limit- ations	Evid. Obj.	Date Mar k -ed for ID	Date Admit - ted
501	Ruifeng 0001- 0060 [disc. QB000007- QB08233]	2013- 2020	Translated e-mails between Quintara/Ruifen g operating as one entity with English translation	D					
502	Ruifeng 0061- 00100 [disc. QB000441- QB00891]	2013- 2020	E-mails acknowledging joint venture cooperation partnership agreement	D					
503	Ruifeng 0101- 0103	2013	Ruifeng- Quintara Joint Co-cooperation Agreement in Chinese language	D					
504	Ruifeng 0104- 0106	2019	Ruifeng- Quintara Joint Co-cooperation Agreement dated 2019 in the Chinese language with translation in English	D			to. 3:20-c	0.1005	

ll ll								
1	505	Ruifeng 0107-0200	2013- 2020	Haystack Invoices from	D			
2	70.5	D 10	2012	2013-2020				
3	506	Ruifeng 0201-0351	2013- 2020	Ruifeng Tax Documents W-2 for shared	D			
4		[Disc. RUIFENG 000009352-		employees, Sue Zhao and				
5		RUIFENG 000009562]		Richard Shan				
6		000007302]						
7 8	507	Ruifeng 0352-0405	2013- 2020	Rene Novoa communications	D			
		[Disc. QB008095-		from Haystack report dated				
9		QB008226]		May 14, supplemental				
				report dated July				
11				07, 2021, and bio				
12	508	Ruifeng 0406-0502	2013- 2020	RF Bio server	D			
13		0400-0302	2020					
14		[Disc. Ruifeng 000001-						
15		00000096]						
16	509	Ruifeng	2013-	Contact List:	D			
17		0503-0536	2020	Quintara Vendor and Customer				
18		[Disc. QB009527-		List entitled				
19		009557]		'profile database'				
20	510	Ruifeng 0537- 0542	2013- 2020	Alex Wong's phone call logs	D			
21		[D' OD E 0		from deposition				
22		[Disc. QB Ex. 8- 12]		exhibits				
23	511	Ruifeng 0543- 0566	2013- 2020	J. Berryhill report exhibits	D			
24			2020	produced at				
25		[Disc. QB Ex. 301-303]		deposition dated				
		-		07/15/2021				
27	512	Ruifeng 0537- 0542	2013- 2020	Investment Blvd., Suite 2. 1-247 pgs	D			

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

513	Ruifeng 0537- 0720	5/7/20 19	Tomo Kimura deposition	D			
	0720	1)	transcript dated				
	[disc.		05/07/2019				
	TK0056-TK0218]						
514	Ruifeng 0721-	2013-	Customer	D			
	0916	2020	invoices with				
			related				
	[disc. Ruifeng		communication				
	000011022-		S				
	00011203]						
515	Ruifeng 0917-	2013-	Trial Graphix	D			
313	0921	2013-	invoices with	D			
	0,21	2020	excel sheet				
	[disc. Ruifeng		with				
	000011255]		information				
	_		such as the				
			smart devices,				
			computer,				
			computer				
			stations,				
			custodian,				
			custodian e-				
			mails.				

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

516	Ruifeng 0921- 0922 [disc. Ruifeng 0009564]		WeChat Messages from phone numbers	D			
517	Ruifeng 0923- 0950 [Disc. QB 25-32]	TBA	Deposition of Christine Chen	D			
518	Ruifeng 0951- 1118 [Disc. HU_00000001 – HU_00000683]	2013- 2020	Documents from Deposition of Henry Hu	D			
519	Ruifeng 1119- 1150 [Disc. JB00001- JB000029]	2021	Deposition of Jon BerryHill production documents	D			
520	Ruifeng 1151- 1231 [disc. QB59-62]	05/13/ 2021	Deposition of Dehua Zhao documents produced	D			

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

521	Ruifeng 1232- 1334 [disc. QB47-58 T Owens]	2021	Deposition of Tiffany Owens documents	D			
522	NONE	TBA	NONE	D			
523	NONE	TBA	NONE	D			
524	Ruifeng 1335- 1400 [disc. 13-20 Qun Shan]	ТВА	Deposition of Qun Shan [Richard Shan] agent of QB, documents, e.g., letter re joint cooperation	D			
525	Ruifeng 1401- 1472	TBA	Deposition of Hailong Jiao documents	D			
	[disc. QB 43-50]						
526	Ruifeng 1473- 1773  [disc. RUIFENG- ZHI 000019- 000073; QB2, 2A, 74-81; AEO Highly confidential material]	2021	Deposition of Charles Zhi, such as e-mails, documents, and miscellaneous	D			
527	Ruifeng 1774- 3107	2021	Deposition of Maryellen Sebold - Expert Rebuttal Report dated May 28, 2021 of pgs. 1333.	D			
528	Ruifeng 3108- 3308	2021	Deposition of Rene Nova documents	D			
	130]		10 pgs.				

1	529	Ruifeng 3309- 3700
2		
3		[RUIFENG- HAYSTACK
4		00006359-0654
5		
6	530	Ruifeng 3701-
7		3706;
8		
9		
10	531	Ruifeng 3707- 3712
11	532	Ruifeng 3712-
12		4200
13		
14		
15	533	Ruifeng 4201- 13300
16		
17		[Disc.
18		QB00411- 009783]
19	534	Ruifeng 13300 13701
20		10/01
21		[Disc.
22	535	QB00441-00872 Ruifeng 13701
23		14801
24		[Disc.
25		QB00373-07583 Ruifeng0001042
		Ruifeng0001102

530	Ruifeng 3309- 3700 [RUIFENG- HAYSTACK 00006359-06544]	2021	Haystack tracking of documents, computer, office equipment from Maryellen Sebold and Rene Novoa. Chain of	D				
	3706;		Custody from Alan Li to Rene Novoa; Sergio Garcia; Nick Passaro.					
531	Ruifeng 3707- 3712	2021	E-mails of Dorothe Shuche	D				
532	Ruifeng 3712- 4200	2013- 2020	E-mails acknowledging joint venture cooperation partnership agreement	D				
533	Ruifeng 4201- 13300 [Disc. QB00411- 009783]	2013- 2020	Employee preparation documents	D				
534	Ruifeng 13300- 13701 [Disc. QB00441-00872]	2013- 2020	Immigration documents	D				
535	Ruifeng 13701- 14801 [Disc. QB00373-07583; Ruifeng00010427 - Ruifeng00011021	2013- 2020	Financial documents	D				

7 Case No. 3:20-cv-04808-WHA
ADDENDUM TO THE JOINT DISCLOSURE OF TRIAL EXHIBIT LIST PURSUANT TO FED. R. CIV. P.

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

536	Ruifeng 14802- 14805	2021			D								
	14003		Deposition of										
	[Deposition		Xuileng Zhao										
	Xueling Zhao		Highly										
	Highly		confidential										
	confidential AEO		AEO										
	documents]		documents;										
	documents		salary records										
537	Ruifeng		SMIMI		D								
	14806-22000	• • • •	Quintara's										
	- 1000 00	2013-	stealing of trac	de									
	[Disc.	2020	secrets from										
	QB001021-9783]		Ruifeng										
538	<u>(</u>		Ruifeng/Gang	v	D								
			ou Wang's	,	_								
	Ruifeng 22000-	2013-	payment of										
	22001	2014	\$1Million US	D									
			to Quintara/										
			Richard Shan										
539	D 16 22002		Lease Exhibit		D								
	Ruifeng 22002-	02/201	Harbor Way,										
	22249	03/201	South San										
	[D] (D 0001	7	Francisco fron	n									
	[BMP 0001-		BlackMountai	n									
	000247]												
540	D:f 22250		Insurance	D				•					
	Ruifeng 22250-	2019	Claim										
	22255		Information										
541	NONE	NONE	NONE	D									
			l						I				
	11017								_	1	1 1		
542	NONE		NONE	NOI	NE				D				
543	Ruifeng 22250-	-	NONE	Dep	ositic	on o	f Sta	acy	D				
	22295				bo X			•					
544	Duifana	2	2013-2020	Dov	Chac		noil		D				
544	Ruifeng 22296-22305		2013-2020	Kay	Shac	) e-i	nam	S	٦				
	22290-22303												
	[RUIFENG 096												
	102]	_											
	102]			<u> </u>									Ш

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	l

545	Ruifeng 22306-22308	2013-2020	Alex Wong Android	D		
			phone messages			
	[RUIFENG 0000009563-		priorie messages			
	9564]		2 pgs.			
546	NONE	NONE	NONE	D		
547	NONE	NONE	NONE	D		
548	Ruifeng 22306-22310	2013-2020	Drop-off Site documents 2 pgs.	D		
549	Ruifeng 22310-22600	2013-2020	18	D		
	[QB008028- QB008072]					
550	D 'C	2012 2020	Quintara balance sheets		_	
550	Ruifeng 22601-22702	2013-2020		D		
	[QB008030; 39;44;50;56;62;		Orintana Danfit 9 I ana			
	69; QB008075]		Quintara Profit & Loss Statements			
551	Ruifeng 22703-22709	2013-2020	Ruifeng RSM documents 4 pgs	D		
547	Ruifeng 22710-22900	2013-2020	Ruifeng Financial documents [Bank of America]	D		
548	NONE	2013-2020	NONE	D		
549	Ruifeng 22306-22308	2013-2020	RuiFeng Relativity Export	D		
550	Ruifeng 22900-23000	9/18/2020	BlackHill documents	D		
551	Ruifeng 23001-23805 [disc. QB008271-	2013-2021	Ruifeng-Quintara Customer Profile Database 250 pgs	D		
	QB008780]		· P5 ·			

1								
Solution   Solution	2	552	23806-23950 [disc. QB108-	2021	=	D		
25001-25052   2021   Deposition of Stacy   Wenbo Xu documents.		553	23951-25000	2021		D		
		554	_	2021		D		
10	8	555	_	2019		D		
12	10	556	25056-25057 [RUIFENG	2013-2020	Gangyou Wang, Alan Li excel sheet – instant	D		
13	12	557	_	NONE	NONE	D		
14   560   NONE   NONE   NONE   D	12	558	NONE	NONE	NONE	D	$\Box$	
14   561 NONE NONE NONE NONE D   562 NONE NONE NONE NONE D   563 NONE NONE NONE NONE D   564 Ruifeng   25058-28803   [Ruifeng-RSM-000001-00003704]   565 Ruifeng   28804-30000	13	559				D		
S61	14	560	NONE	NONE	NONE	D		
16	17	561	NONE	NONE	NONE	D		
Total   Tota	15	562	NONE	NONE	NONE	D		
Total	16	563	NONE	NONE	NONE	D		
S65   Ruifeng   28804-30000     QB008231-9804   RUIFENG   00011256-   00011817;   00011818-   00011948     S66   NONE   NONE   D     S68   NONE   NONE   D     S68   NONE   NONE   D     S69   NONE   NONE   D       S69   NONE   NONE   D	17 18	564	25058-28803 [Ruifeng-RSM- 000001-	2013-2020	Ruifeng RSM documents	D		
567   NONE NONE   D	<ul><li>20</li><li>21</li><li>22</li><li>23</li></ul>		28804-30000 QB008231-9804 RUIFENG 00011256- 00011817; 00011818-	2013-2020		D		
567         NONE         NONE         D           568         NONE         NONE         D           569         NONE         NONE         D				NONE	NONE	D		
569 NONE NONE D	75	567		NONE	NONE	D		
		568		NONE	NONE	D		
	27	569		NONE	NONE	D		

570	Ruifeng 30000-30005	03/16/2017	Lease Exhibit Harbor Way, South San Francisco	D			
			[QB46 T Owens]				

## LAW OFFICE OF RESHMA KAMATH

DATED: June 30, 2023 / St. Reshma Kamath

Reshma Kamath,

Counsel for Defendants RUIFENG BIZTECH INC.; GANGYOU WANG; ALAN LI; and, RF BIOTECH LLC

## **CERTIFICATE OF SERVICE**

F.R.C.P. 5 / C.C.P. § 1013(a)(3), C.C.P. § 1010.6(a)(6) / Cal. R. Ct. R. 2.260.

I am employed in, the County of San Mateo, California. I am over the age of 18, and not a party to this action. My business/mailing address is: 700 El Camino Real, Suite 120, #1084, Menlo Park, California 94025, United States; and, e-mail address is reshmakamath2021@gmail.com for electronic-service. On June 30, 2023, I sent the following documents via the below method of service. SEE ATTACHED SERVICE LIST.

## ADDENDUM TO JOINT DISCLOSURE OF TRIAL EXHIBIT LIST PURSUANT TO FED. R. CIV. P. 26(A)(3)(A);

## CERTIFICATE OF SERVICE.

///

Via **ELECTRONIC SERVICE**: In electronically transmitting courtesy copies of the document(s) listed above to the email address(es) of the person(s) set forth on the attached service list per the electronic service agreement between the parties' counsel. To my knowledge, the transmission was reported as complete and without error. [Notice of Electronic-Service pursuant to California Code of Civil Procedure § 1010.6.]

///

I declare under penalty of perjury of the laws of the State of California, and the laws of the United States of America that the foregoing is true and correct. Executed on June 30, 2023.

Sincerely,

/S/ Reshma Kamath
Reshma Kamath

1	SERVICE LIST
2	Daniel Robert Peterson Email: petersond@lilaw.us
4	Richard D Lambert Email: lambertr@lilaw.us
6	Tamara Rider Email: ridert@lilaw.us
8	J. James Li LiLaw, Inc.
9	1905 Hamilton Avenue Suite 200 San Jose, CA 95125 650-521-5956 Fax: 650-521-5955 Email: lij@lilaw.us
11 12	ATTORNEY TO BE NOTICED ATTORNEYS FOR PLAINTIFF QUINTARA BIOSCIENCES, INC.
13 14	Ting Jiang, LiLaw, Inc./Quintara's Legal assistant E.: jiangt@lilaw.us
15 16	
17	
18 19	
<ul><li>20</li><li>21</li></ul>	
<ul><li>22</li><li>23</li></ul>	
24	